

## REMARKS

Applicant repeats the remarks previously offered. It appears from the Office Action Response to Arguments that the Examiner did not process that there was a discrete injection well in each independent claim from the borehole. This is now further being made explicit. It is the applicant's position that although the completion methods of fracturing and injection have been used before, the method of using the extending assemblies in injection service has never been tried despite the fact that extending assemblies have also been known and used in other contexts. The inventions claimed in the independent claims are not only novel but clearly unobvious because despite the history given above, the present inventions are only now first disclosed in this application.

Claims 1 and 15 are rejected as anticipated over the Applicant's prior patent USP 5,829,520. The Examiner points to the reference as teaching an application for injection but that term does not appear anywhere in this reference. The problem may be the term "injection" which is a term of oilfield art having a unique definition different than the ordinary dictionary definition of the term. In the oilfield an injection operation usually involves two wells. One is the producing well where production for a variety of reasons has fallen off. Usually, the formation pressure has decreased or the viscosity of the produced hydrocarbons has increased. The other well is an injection well. It goes down into the same pay zone as the formerly producing well. The injection well sees high flow rates going in of water or steam to try to push the hydrocarbons out of the production well. These techniques of injection are known. However, these injection techniques have heretofore never been used with the extendable members having a filter media in them.

Yes, extendable members with filter media are shown in the Johnson '520 patent. The point is that no benefit for the structures shown in the Johnson '520 in injection service was realized until the present invention. The Examiner points to column 13 line 45 to column 14 line 55. What are discussed there are completion techniques such as acidizing and/or fracture stimulation that usually involves a trickle of flow as compared to injection operations. The point is that despite the known status of injection as a technique and the existence of the Johnson '520 patent, those skilled in the art had not thought of using the combination in an injection operations. In the hope of bringing this

important point across, the independent claims have been amended to expressly include the injection and production wells in the method to emphasize that the claimed method is not anticipated by Johnson '520 that teaches using the extendable members with filters in a completion technique rather than injection.

Claims 1, 8 and 15 have been amended to add the production well and connect it to the injection process using the extendable members with filters. These claims are not anticipated by Johnson '520 as to claims 1 and 15 or by the combination of Johnson '520 and Parlar as applied to claim 8. In short it is not known or obvious to use the extending members with filters in an injection operation despite the availability of extending members with filters and the prior knowledge of injection operation techniques. The present invention has put these elements together for a better result in injection operations meeting a need that has not been addressed by those skilled in the art.

Allowance of all the claims is requested.

Respectfully submitted,

06/03/2008

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